

WALTER CURRIT

Name and Prisoner/Booking Number

Mule Creek State Prison

Place of Confinement

P.O. Box 40920

Mailing Address

Ione California 95640

City, State, Zip Code

FILED**Mar 05, 2020**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

(Failure to notify the Court of your change of address may result in dismissal of this action.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

WALTER CURRIT
(Full Name of Plaintiff)

Plaintiff,

(1) Gov Gavin Newsom
(Full Name of Defendant)

(2) Ex-Gov Jerry Brown

(3) Del Sheriff Walter MCRP

(4) Scott Lewin

Defendant(s). *ET AL* Check if there are additional Defendants and attach page 1-A listing them.

)

CASE NO.

2:20-cv-0503 KJN (PC)

(To be supplied by the Clerk)
"Demanding A Jury Trial"

**CIVIL RIGHTS COMPLAINT
BY A PRISONER**

- Original Complaint
 First Amended Complaint
 Second Amended Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

- 28 U.S.C. § 1343(a); 42 U.S.C. § 1983
 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).
 Other: _____

2. Institution/city where violation occurred: MULE CREEK STATE PRISON P.O. BOX 40920 IONE CALIFORNIA 95640.

SHORT TITLE:

CASE NUMBER:

*Individual Defendants*1 *[ALL DEFENDANTS ARE BEING SUED IN THEIR OFFICIAL & INDIVIDUAL CAPACITY.]*

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5. *Ralph M. Diaz*
6. *Diana Tache*
7. *Connie Gipson*
8. *Terry BerkenCourt*
9. *Tamir Ahmed*
10. *Gregory Larrabee*
11. *Harold Hold*
12. *Andrew Alteroqt*
13. *City of Jane*
14. *County of Smoker*
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26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, **not** line
numbers):

27 This page may be used with any Judicial Council form or any other paper filed with the court.

Page *A1*

B. DEFENDANTS

1. Name of first Defendant: Gavin Newsom. The first Defendant is employed as:
Governor of the State of California at STATE CAPITAL OF SACRAMENTO CA.
(Position and Title) (Institution)
2. Name of second Defendant: Terry Brown. The second Defendant is employed as:
Ex. Governor of the State of California at UNKNOWN.
(Position and Title) (Institution)
3. Name of third Defendant: Tom Lippert. The third Defendant is employed as:
Warden at Alcatraz State Prison.
(Position and Title) (Institution)
4. Name of fourth Defendant: Scott Klemm. The fourth Defendant is employed as:
Deputy District Ex at OVER LODGE STATE PRISON.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? Yes No
2. If yes, how many lawsuits have you filed? _____. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - b. Second prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - c. Third prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

SHORT TITLE:

CASE NUMBER:

ADDITIONAL DEFENDANTS1 All Defendants are being sued in their official & individual capacities.

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5 5. Name of Fifth Defendant. Ralph M Diaz. The Fifth Defendant is Employed as:6 Deputy Director at Over CIVIL State Prison System.
(Position and Title) (Institution)

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8 6. Name of Sixth Defendant. Diane Taube. The Sixth Defendant is Employed as:9 The Secretary of Health Care at Over CIVIL State Prison System.
(Position and Title) (Institution)

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11 7. Name of Seventh Defendant. Connie Lippman. The Seventh Defendant is Employed as:12 The Deputy Director of Facility Operation at Over CIVIL State Prison System.
(Position and Title) (Institution)

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14 8. Name of Eighth Defendant. Terry Bettercourt. The Eighth Defendant is Employed as15 Regional Facilities Manager at Over CIVIL State Prison System.
(Position and Title) (Institution)

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17 9. Name of Ninth Defendant. Tamie Ahrend. The Ninth Defendant is Employed as:18 Associate Director at Over CIVIL State Prison System.
(Position and Title) (Institution)

19

20 10. Name of Tenth Defendant. Leeland Lippman. The Tenth Defendant is Employed as:21 Environmental & Regulatory Compliance at _____.
(Position and Title) (Institution)

22

23 11. Name of Eleventh Defendant. Arnold Hall. The Eleventh Defendant is Employed as:24 Supervisor blocker at Central Valley Regional Office Quality Control Board Compliance
(Position and Title) (Institution)
&25 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):26 This page may be used with any Judicial Council form or any other paper filed with the court.

Page 13

SHORT TITLE:

CASE NUMBER:

ADDITIONAL DEFENDANTS

1 All Defendants^s are being sued in their official & individual capacity, I.

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12 12. Name of Twelfth Defendant. Patricia Alixapt. The Twelfth Defendant is Employed as:
13 Assistant Executive Officer at Central Valley Regional Center Disability Board
(Position and Title) Institution.

14

15 13. Name of Thirteenth Defendant. Clyt of Tore. The Thirteenth Defendant is
Employed as: Clyt at Tore California.
(Position and Title) Institution.

16

17 14. Name of Fourteenth Defendant. Clyt of Bothe. The Fourteenth Defendant is
Employed as: Clyt at Anzale.
(Position and Title) Institution.

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26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, **not** line
numbers):

27 This page may be used with any Judicial Council form or any other paper filed with the court.

Page 2C

Form Approved by the
Judicial Council of California
MC-020 [New January 1, 1987]
Optional Form

ADDITIONAL PAGE
Attach to Judicial Council Form or Other Court Paper

WEST[®]

CRC 201, 501

D. CAUSE OF ACTION

CLAIM I

1. State the constitutional or other federal civil right that was violated: 8th Amendment Civil Violation
"Protection against Cruel and Unusual Punishment" (to safe, clean drinking water.)

2. Claim I. Identify the issue involved. Check only one. State additional issues in separate claims.

- | | | | |
|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim I. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Plaintiff asserts that all named Defendants are civilly liable under the 8th amendment violation. Gavin Newsom Gov.: Tom Brown, Ex-Gov.; Troy Brown, Ex-LtGov.; Ex-Warden of MCFSP: Scott Roman, Ex-Deputy Director of CDCR; Ralph M. Diaz, Deputy Director of CDCR; Diana Taché, Secretary of Health Care for CDCR; Connie Gipson, Deputy Director of Facility Operation of CDCR; Terry BetterCourt, Regional Facilities Mgr.; Terrie Pineda, Associate Director of CDCR; Gregory Lonsdale, Chief Environmental Regulatory Compliance; Harold Held, Supervisor Worker (C.V.R.W.D.C.B.); Andrew Alivogi, Assistant Executive Officer (C.V.R.W.D.C.B.); City of Los Angeles; The County of Los Angeles.

1. Plaintiff asserts that Defendants Gavin Newsom Gov. & Troy Brown, Ex-Gov. are liable.

2. Plaintiff asserts that [I] have suffered Grievous injury from the above named Defendants by being forced to suffer the (Tabunzone), and Negligent Treatment of him forced to drink. And bath with a water supply at mcfsp that is contaminated with industrial waste, and human waste.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

Plaintiff myself is an ongoing cough everyday throughout the day where it pains my insides with Joint Pain aches and dizziness

5. Administrative Remedies:

- a. Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? Yes No
- b. Did you submit a request for administrative relief on Claim I? Yes No
- c. Did you appeal your request for relief on Claim I to the highest level? Yes No
- d. If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Under 8547 Whistle Blower's Act a plaintiff need not exhaust Administrative Remedies To file A Suit. California STATE AUDITOR Case No 12019-1462

D. Cause Of Action Claim I

Continued as p. 3 d

3 Plaintiff asserts that defendants' Joe George, MESP's ex-Worker
4 are civilly liable, along with his superiors: As these unsafe, and
5 unhealthy living conditions are under his direct supervision with
6 complete knowledge of the contaminated water at msp.

7 (recess) deputy directors', and those named defendants'"], are
8 aware of the prison systems' contamination of water supply
9 problem along with mesp.

10 Gregory Lambree, chief environmental regulatory compliance; Harkel
11 Hold, supervisor worker [C.V.R.W.Q.C.B]; Andrew Mirovitz,
12 Assistant Executive officer [C.V.R.W.Q.C.B]; Are also civility battle
13 as they where one of the seriousness of the contaminated water at
14 mesp.

15 And as this is a seriously bad problem (he) one has informed the
16 prison population.

18 Plaintiff asserts that there are in fact currently no less than #7
19 sites on "t-facility MCSP alone that show clearly visible signs of
20 mixed water with an oil base seepage clearly from some broken pipes
21 located underground. Several of these pipes, 5 sites can clearly be
22 determined to be sewage pipes.) which are located in the
23 following areas of the yard of (3-facility).

24 A sewage pipe located between the Education Room Door,
25 and the Chapel door approx. 10 ft. out from the wall in the grass.

b) A sewage pipe located between the Canteen windows, and the medical room door approx. 10 ft. out from the wall in the grass.

- 1 c.) A sewage pipe's & water supply pipes, located near building
- 2 #2, between the exercise area of parallel workout bars, And
- 3 the dirt track approx. 20 ft. or so straight out from the
- 4 parallel bars next to the dirt track.
- 5 d.) Sewer pipe under the light pole, in front of Yard Gate.
- 6 e.) Water pipe in front of the yard bathroom area on the inside
- 7 grass area of the Asphalt Track.
- 8 f.) Water pipe located in the sprinkler box located in front of building
- 9 #4 on the inside of the asphalt track.
- 10 g.) Water, and sewer pipes located next to building #5 #1., -
- 11 h.) Water, and sewer pipes located between building #5 Yard Deck,
- 12 and the Handball Court coming out of the ground.

These are merely the visibly broken pipes you can see are broken, due to there being water seepage with a (Dark Black Oil like film) [in which you can smell the odor of sewage, gas, and oil.] And on certain days, the strong smells of gas come out of those sewer pipes, are enough to give an extremely bad headache.

And the smell of raw sewage is close to constant odors. There are often mostly sink holes from the water seepage even when there has been no rain and you can see that the water is contaminated with a dark oily like film as it is just sitting in puddles. It can be determined from the different puddles of water sitting as stated when there's been no rain it would be only common sense that there is a crack/break/casing leak for there to be water sitting. And this contamination of water sits ground upon soft dirt.

1 The smell of feces is also a common smell in the water, along
2 with a strong odor of dirt. Which is very strong for 30, to min
3 in the building during dayroom when the showers start running
4 and in the mornings in the cell when using the sink.

5 There has been construction of heavy equipment driving around
6 the yard close to 2 1/2 years prior now on the soft soil where
7 pipes old, and corroded are at.

8 And the statement of "THE OLD, AND CORRODED PIPES ARE THAT
9 OF CDCR STAFF CONFIRMING THAT MOST SEWER PIPES IN THE
10 YARD WHERE CAST IRON. AND THAT WITH 30 YEARS OF
11 CORROSIVE SEWAGE MOVING THROUGH THE PIPES. IT HAS CORRODED
12 OUT OF THE PIPES. CDCR FAILED TO INVESTIGATE THESE PIPES AS
13 PROPOSED IN THEIR APPROVED STORM WATER INVESTIGATION WORKPLAN."

14 Now barring the fact mesps growth in prisoner's from an
15 occupied 1,700 prisoner's in 1987 the year. And in dec 1994
16 the 15th day, the city of lodi, took cdcr to court for
17 violations over Environmental Quality Act (EQA). For violation
18 of its original NCSP Contract.

19 In last, 1987, had 3,900 prisoners' with 1,000 staff, and
20 the priens system ran at 230 percent of its designed
21 capacity.

22 Currently NCSP population is 6,375 which is well over that 3,908
23 prisoners', and 1,425 staff member.

24 Which has well went beyond what the capacity of water on the cast
25 iron pipes but CDCR knew this. Yet has not fixed the problem then.
26 And now the prison is at such a level of contamination of its water
27 where plaintiff has gotten injury from water that is not safe to
28 drink.

1 5.) Plaintiff asserts that these statements are quoted by one
2 ANDERSON DAVID, who was hired by CDRR.
3

4 “I was told I was building & COLLECT TO PROTECT WILDLIFE. I had
5 NO IDEA THAT IT HAD NOTHING TO DO WITH PROTECTING BIRDS AND
6 WILDLIFE. THE POINT FOR CDRR WAS TO HIDE INDUSTRIAL AND
7 DOMESTIC SEWAGE DISCHARGES IN AN UNDERGROUND POND.”
8 Said Anderson. “BIRDS AREN’T DROWNING FROM THE ELECTRIC FENCE.
9 THEY ARE DYING FROM THE WATER ITSELF.”

10 Further defendants' did in fact hire a testing facility from
11 Miami Florida, which does not utilize the Federal
12 ENVIRONMENTAL PROTECTION AGENCY STANDARDS, or Regulations for
13 Testing, to test water samples from MESP, and even
14 fabricated reports given to state and federal agencies
15 regarding, and to conceal the fact that the “Zeta Design Prison
16 In California” (ZD) suffer from a severe design flaw
17 which jeopardizes the safety of Ten's of Thousand's of
18 prisoners, and their visitors by subjecting them to
19 the same treatment suffered by the plaintiff.”

20 6.) Plaintiff asserts that at no point has MESP's Water Treatment
21 Licensing, nor CDRR, put out a (“Memo / Memorandum”) To
22 Inform plaintiff about the seriousness of this contamination of
23 water that plaintiff is forced to drink, and bathe in.
24 Had it not been for plaintiff complaining to family about
25 the pains, and injuries listed that I was suffering she
26 would never went on line, and plaintiff's medical nurses
27 further informed plaintiff that the water is really bad to drink
28

1 plaintiff wouldn't have known the true extent of the problem.
2

3 This water has harmed plaintiff where Medical had to
4 provide medication.

5 Free Staff, G's, & Nurses have mentioned numerous times at MCSF
6 that they where advised by way of a computer generated memo
7 informing them not to drink the water.

8 It is also alleged to be signs posted in the visiting room areas
9 advising visitors not to drink the water.

10 There are signs outside of MCSF stating "DO NOT LET YAK
11 CHILDREN, or (PETS) Come In Contact With The Water From Mule
12 Creek State Prison, STATING [BIOHAZARD] File CW-241842 Regional
Water."

13 Even the Nurses, and Doctors say that inmates should boil
14 their water before drinking it. Plaintiff has no way of
15 boiling his water due to the prison not allowing hot pots
16 that boil.

17 Plaintiff will reiterate that MCSF's population has never
18 been informed as to the drinking, and bath water's
19 contaminated. It is alleged that there are signs
20 posted in the visiting room areas.

21 It is an obligated duty of MCSF's Warden as well as
22 CDCR Employees to inform alarm, plaintiff and the
23 population of this contaminated water. Along with
24 providing Bottled Water.

25 Where the source of the Contamination Problem that has
26 plagued the prison and City of Lodi, along with the County
27 of Amador.

28

CLAIM II

1. State the constitutional or other federal civil right that was violated: Fourteenth Amendment United States Constitution: "Equal Protection."

2. Claim II. Identify the issue involved. Check only one. State additional issues in separate claims.

- | | | | |
|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Plaintiff asserts that all named Defendants are guilty under the Fourteenth Amendment. Gov. Gavin Newsom; Ex-Gov. Jerry Brown; Jim Headley, Director MISD; CDRK; Scott K. Reid, Ex-Deputy Director; Ralph M. Diaz, Deputy Director; Diane Tavel, Secretary of Health Care CXR; Connie Gilroy, Deputy Director of Facility Operations CXR; Telka Bennett, Regional Facilities MVR; Dennis Atherton, Associate Director PWR;

All the above named Defendants are in violation of Plaintiff's Fourteenth Amendment as they all held the authority of CXR. To have warned plaintiff about the Contaminated water, but they failed to do so. As they failed to warn the prison population of MISD and as this serious health hazard of Contaminated water supply was being forced to consume by plaintiff. CXR, MISD, protected their Employees. By writing a memorandum by contractor - Failing to protect plaintiff from suffering any harm of medical issue by the Contaminated water. Plaintiff is being forced to consume Contaminated water by not making plaintiff aware of the existence of said intrusive conditions. And not providing relief from the relief from these intrusive conditions. (Underwateroxic [unintelligible]).

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

Failed To Protect For Failing To warn about Contaminated water & Failing To Provide clean drinking water!

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? Yes No
- Did you submit a request for administrative relief on Claim II? Yes No
- Did you appeal your request for relief on Claim II to the highest level? Yes No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Under 8547 Whistle Blower's Act A Plaintiff does not exhaust Administrative Remedies To File A Suit. California State Appeal Case No. 12019-1462

1 Claim II supporting facts
2 Continued pg 4a.

3 1.) Plaintiff asserts that (He), has been housed at MCSP, since
4 Dec. of last, and that Defendants' have never posted Any
5 Notice or Memorandum to the whole inmate pop stating that the
6 water was contaminated.

7
8 2.) However MCSP, did infact send out with regard to the
9 water and its contamination, There was a Deceptive Memorandum
10 posted stating that the water was safe for consumption.
11 And it wasn't until recently that plaintiff learned of there allegedly
12 being over MCSP, memo's posted for visitor's in the visiting areas
13 warning visitor's of the contaminated water.

14
15 3.) Plaintiff asserts that MCSP has not provided a clean source of
16 water for himself, or the Prison Population(s) consumption. Even
17 though CDR, MCSP, has the knowledge that the water supply is
18 infact contaminated. Defendants' have infact had knowledge of the
19 existing problem since at least (2006), and the inmate
20 population still continues to suffer harm from the Contaminated
21 water.

22
23 4.) Plaintiff asserts that all COOL officer's at MCSP, are under
24 the Color of Law . And are also responsible for failure to
25 Report misconduct. Which is a violation of COOL's Memorandum
26 to all COOL Peace officers warning them about the ZERO
27 TOLERANCE Policy Prohibiting THE "Code of Silence Among
28 Prison Officers, Failure, / REFUSING TO REPORT A CRIME, or misconduct.

CLAIM III

1. State the constitutional or other federal civil right that was violated: Violation of the 11th Amendment to the Const. (or Sovereign Immunity) 42 U.S.C. 241 & 242 Conspiracy To Deny Right Under Color of the Law."

2. Claim III. Identify the issue involved. Check only one. State additional issues in separate claims.

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|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim III. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

In Plaintiff asserts that defendants' did not act in several occasions Good Faith from the start, and federal agencies concerning this matter. Therefore Abusing their Constitutional Right To Sovereign Immunity under the Eleventh Amendment To The U.S.A.

In Plaintiff makes references to the State's spoken By General Laramore. That Regulatory compliance for MCR. "We have spent over \$2 million, to date in conducting a comprehensive site wide investigation of the storm water collection system at MSCP."

3. Plaintiff makes another references Date from the letter Displaced who contacted a Master Plumber To Discover Investigating the THREE SEWER SYSTEMS of MSCP. As ITSAVER Labbel Pickers, looking at the photos. It seems like there is water. But Catastrophic. THAT should not be there. It could be that one of the storm lines is connected to the wrong system. causing the issue. It could be pipes are broken. or catastrophic failure. We do want access to all the systems and every where we can look.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

12 U.S.C. 241 & 242 "Conspiracy To Deny Right Under Color of the Law." Plaintiff asserts that All Defendants' did intent conspire to deny plaintiff his basic Human Right to clean Consumable water. Plaintiff also asserts defendants' Did in fact Conspire.

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? Yes No
- Did you submit a request for administrative relief on Claim III? Yes No
- Did you appeal your request for relief on Claim III to the highest level? Yes No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Under 8547 Whistle Blower's Act A Plaintiff need Not Exhaust Administrative Remedies To file A Suit. California State Auditor Case No 12019-1462

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

1 *Plaintiff Supporting Facts Continued*
2 *as pg 8.*

3 We follows the flow of water, and can cameras test all the lines
4 I'm guessing it would take two weeks, certainly it could be
5 completed in four or five weeks. With a couple cameras, giving
6 eight hours a day.

7 I'd charge \$125.00 an hour, looking at the whole system, I would
8 have your answer and a complete look at the entire MESP water
9 system for \$5000 a week (Monday-Friday). A five week
10 investigation would total \$25,000. Once we know what we are
11 dealing with pipes can be replaced with liners and the like, not
12 an easy process, especially in a Prison Environment.

13 But I imagine you could move folks around as you required
14 different sections like I said, it is a logical process. It
15 wouldn't be easy, and if it is catastrophic, it would be hard to fix.
16 but it certainly can be done."

17 4. Plaintiff asserts he is a state prisoner at MESP, and that my
18 drinking water to this date has and is making me sick it is not clean.
19 It doesn't smell clean. At any time you smell the water it has
20 an odor of dirt, sewage, chemicals or BOP. It's alleged that

21 There was a contract of Sept 9, 1985 for a sewage treatment
22 plant, this not happened, BOP, continues to allow a very
23 serious Health Hazard Problem with contaminated water to go
24 unresolved.

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1 5. Plaintiff asserts that on the day of 8.5.2014, the water smelled
2 and tasted like sewage in buildings 4, 2, 3, 1 as abt of inmates
3 complained, I plaintiff live(l) in building #2

4
5 6. MJSI, COX, has received continuous funding for a fix of a
6 serious health water from outside sources for some time and
7 they do give a good speech as to what is being done to those
8 who can't actually verify that nothing is being done, and hasn't
9 for years. Still plaintiff along with MJSI population continue
10 to suffer from MJSI's contaminated water supply.

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t. Injury Continued.

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to hide the fact from plaintiff, and inmate population at
MJSI that the water is or may be Contaminated and
dangerous to consume. And did in fact contract a
construction crew from Sierra Construction and Construction
Incorporated (SCI) to Build a Culvert System which MJSI,
& COX would use to hide the true extent of Contamination
using California State Tax Payer Dollars.

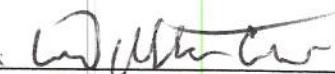
E. REQUEST FOR RELIEF

State the relief you are seeking:

Plaintiff hereby seeks in Monetary sum of (\$10,000,000.00 +) Ten Million Dollars Plus: Compensation/Damages Plaintiff seeks (\$100,000,000.00 +) One Hundred Million Dollars Plus in
Injunctive Damages, and/or a Governor's Order / Commutation of sentence for THE COURT
Case No # 117993 resulting in immediate release from Prison. Plaintiff seeks that
All taxes Both State & Federal To Be Paid in Full by the Defendants. And not taken
from Monetary sum Awarded to Plaintiff. " INJUNCTIVE RELIEF THAT ALL F/T 270
Design Miles with Contaminated Water be brought up to Age Health and Safety Codes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2-23 2020
DATE



SIGNATURE OF PLAINTIFF

N/A
(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

N/A
(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.

SHORT TITLE:

CASE NUMBER:

E. REQUEST FOR RELIEF Continued.

1 Under STATE & FEDERAL Law and Fact.

2 Plaintiff also seeks Monetary Compensation from All named Defendants in
 3 their Private capacities in the following sums with laws to be placed
 4 against all movable possessions, Bank accounts, Pension, Future and Current
 5 Employment checks, as follows:

6
 7 1. First Defendant: Gavin Newsom (Governor State of California)
 \$1,000,000⁰⁰ in Compensatory Damages. \$2,000,000⁰⁰ in Punitive Damages.

8
 9 2. Second Defendant: Jerry Brown (Ex-Governor State of California)
 \$1,000,000⁰⁰ in Compensatory Damages. \$2,000,000⁰⁰ in Punitive Damages.

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 11 3. Third Defendant: Tom Leppert (Ex-Warden)
 \$500,000⁰⁰ in Compensatory Damages. \$1,000,000⁰⁰ in Punitive Damages.

12
 13 4. Fourth Defendant: Scott Sekula (Ex-Deputy Director)
 \$500,000⁰⁰ in Compensatory Damages. \$1,000,000⁰⁰ in Punitive Damages.

14
 15 5. Fifth Defendant: Ralph M. Droe (Deputy Director)
 \$500,000⁰⁰ in Compensatory Damages. \$1,000,000⁰⁰ in Punitive Damages.

16
 17 6. Sixth Defendant: Dana Tache (Secretary of Health Care)
 \$250,000⁰⁰ in Compensatory Damages. \$500,000⁰⁰ in Punitive Damages.

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 19 7. Seventh Defendant: Bonnie Gipson (Deputy Director of Facility Operation)
 \$250,000⁰⁰ in Compensatory Damages. \$500,000⁰⁰ in Punitive Damages.

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 21 8. Eighth Defendant: Terry Bentlercourt (Regional Facilities Mgr)
 \$1,000,000⁰⁰ in Compensatory Damages. \$2,000,000⁰⁰ in Punitive Damages.

22
 23 9. Ninth Defendant: Terri Ahmed (Associate Director)
 \$250,000⁰⁰ in Compensatory Damages. \$500,000⁰⁰ in Punitive Damages.

24
 25 10. Tenth Defendant: Gregory Larabee (Environmental & Regulatory Compliance)
 \$250,000⁰⁰ in Compensatory Damages. \$500,000⁰⁰ in Punitive Damages.

26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):

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Page 6.1

SHORT TITLE:

CASE NUMBER:

E. REQUEST FOR RELIEF (Continued)

11. Eleventh Defendant: Harold Hall. (Supervisor Water Central Regional Water)
 2 \$20,000~~00~~ in Compensatory Damages. \$400,000~~00~~ in Punitive Damages.

12. Twelfth Defendant: Andrew Alverogt. (Assistant Executive Officer Central Valley
 3 Regional Water)
 4 \$200,000~~00~~ in Compensatory Damages. \$400,000~~00~~ in Punitive Damages.

13. Thirteenth Defendant: City of Lodi. (One California)
 5 \$3,000,000~~00~~ in Compensatory Damages. \$4,000,000~~00~~ in Punitive Damages.

14. Fourteenth Defendant: County of Amador. (County of Amador)
 6 \$3,000,000~~00~~ in Compensatory Damages. \$4,000,000~~00~~ in Punitive Damages

7 Plaintiff also hereby seeks that all taxes on all Monetary Compensation
 8 be paid in Total by All Defendants' and that all Court fees be paid by
 9 All Defendants' as well.
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